

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re :
 : Chapter 7
CLUB VENTURES INVESTMENTS LLC, :
d/b/a DAVID BARTON GYM, *et al.*, : Case No. 17-10060 (SHL)
 :
Debtors¹. : Jointly Administered
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**AFFIDAVIT OF KARL KNECHTEL IN SUPPORT
OF THE TRUSTEE'S APPLICATION FOR THE SUBSTITUTION AND RETENTION OF
KNECHTEL ADVISORS LLC AS ACCOUNTANTS FOR THE CHAPTER 7 TRUSTEE,
PURSUANT TO SECTION 327(a) OF THE BANKRUPTCY CODE**

Karl Knechtel, being duly sworn, deposes and states that the following is true to the best of my knowledge, information, and belief:

1. I am a Certified Public Accountant, licensed under the laws of the States of New York, and Managing Director of the firm Knechtel Advisors LLC ("Knechtel Advisors"), which maintains its main office in Atlantic Highlands, NJ and has been serving the accounting, tax and business consulting needs of public and private companies since 2017. I am familiar with the facts and circumstances set forth herein.

2. This affidavit is being submitted in accordance with the application of Yann Geron (the "Trustee"), as the chapter 7 trustee of the estates of DB 85 Gym Corp. d/b/a David Barton Gym, Club Ventures III, L.L.C. d/b/a David Barton Gym, and Club Ventures X, LLC d/b/a David Barton Gym (collectively, the "Legacy Debtors"), Club Ventures Archive LLC d/b/a David Barton Gym Club Ventures Limelight LLC d/b/a David Barton Gym, and Club Ventures Miami LLC d/b/a David Barton Gym (collectively, the "Non-Legacy Debtors") and Club Ventures Investments

¹ The Debtors refer to DB 85 Gym Corp. (Case No. 16-13580), Club Ventures III, L.L.C. (Case No. 16-13581), Club Ventures X, LLC (Case No. 16-13582), Club Ventures Archive LLC (Case No. 16-13616), Club Ventures Limelight LLC (Case No. 16-13617), Club Ventures Miami LLC (Case No. 16-13618), and Club Ventures Investments LLC (Case No. 17-10060), all of which did business as DavidBartonGyms prior to their respective filings.

LLC (collectively, the “Debtors”), the above-captioned debtors. The Trustee seeks to substitute Friedman LLP and to retain Knechtel Advisors as his accountant in these cases.

3. Knechtel Advisors and its professionals have extensive familiarity with forensic accounting practices in insolvency matters in the bankruptcy courts and thus are well equipped to represent the Trustee herein.

4. To the best of my knowledge, neither I, nor any member of Knechtel Advisors represents any professional in this case, nor am I or any member of Knechtel Advisors associated with the Debtors, any creditors or any other party in interest in this case, except as described herein, the United States Trustee or any person employed in her office, and are “disinterested” as such term is defined by Section 101(14) and 327 of title 11 of the United States. Code (“Bankruptcy Code”).

5. Neither Knechtel Advisors nor I hold or represent any interest that would be adverse to the Debtors or the Debtors’ estates.

6. I have reviewed the parties listed by the Debtors on their petitions and reviewed the records of Knechtel Advisors, and have determined to the best of my knowledge and after due inquiry within Knechtel Advisors, that Knechtel Advisors has not represented any such entity. We will continue to review our records and files and will advise all parties, and amend this Affidavit, if we become aware of any such connections.

7. As part of its practice, Knechtel Advisors appears in cases, proceedings, and transactions involving many different creditors, shareholders, attorneys, accountants, financial consultants, investment bankers, trustees, and other entities, some of which may be or represent claimants and/or parties-in-interest in this case. Other than as disclosed herein, Knechtel Advisors

does not represent any such entity in connection with the pending case or have a relationship with any such entity or professional.

8. Knechtel Advisors further represents that our research did not reveal any fact or situation that would represent a conflict of interest for Knechtel Advisors.

9. I have discussed the services required with the Trustee, which services consist of the following:

- (a) Locate and secure the Debtors' books and records,
- (b) Review the status of the Debtors' locations and assets contained therein,
- (c) Conduct financial investigations appropriate and necessary in the circumstances, potential insider transactions, preference payments, and fraudulent transfers.

- (d) Review of the Debtors' pre- and post-petition books and records, as appropriate.

- (e) Prepare estate annual income tax returns, if appropriate.

- (f) Perform any other services that may be required in our role as accountants to the Trustee or that come to our attention as may be requested by Trustee or his counsel.

10. I will plan and directly supervise all of the services set forth above, subject to the review and authorization of the Trustee.

11. Knechtel Advisors agrees to charge, subject to this Court's approval in accordance with Section 330(a) of the Bankruptcy Code, its standard hourly rates for work of this nature and for this type of matter, plus its customary reimbursements as charged to bankruptcy and non-bankruptcy clients. Knechtel Advisor's current hourly rates are as follows:

Partners	\$250 per hour
Staff and Seniors	\$100-\$200 per hour

12. No clerical or administrative services will be billed to the estate.

13. Based upon the information available to me, and except as otherwise described herein, Friedman holds no interest adverse to the Trustee, the Debtors, their estates or creditors as to the matters in which it is to be employed. I believe Knechtel Advisors is a “disinterested person” as defined in Section 101(14) of the Bankruptcy Code. I know of no reason why Knechtel Advisors cannot act as accountants for the Trustee.

/s/ Karl Knechtel

Karl Knechtel, C.P.A.

Sworn to before me this
12th day of July, 2017

/s/ Barbara Ann Klauke

Barbara Ann Klauke

Notary Public, State of New York

No. 01KL6337081

Qualified in Kings County

Commission Expires February 16, 2020